IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

CUSTOMINK, LLC,)	
Plaintiff,)) Case No. 1:11cv-662 CMH-	ТСВ
v.)	
SHIRTMAGIC, LLC,)	
Defendant.)) /	

DEFENDANT SHIRTMAGIC, LLC'S MOTION TO COMPEL BETTER ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION

Defendant, Shirtmagic, LLC, ("Defendant" or "Shirtmagic") by and through undersigned counsel, moves this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule of the Eastern District of Virginia Rule 37, and for the reasons stated in the accompanying Memorandum in Support (filed herewith), to compel better answers to interrogatories and requests for production.

[Signature follows on next page]

Respectfully submitted,

LAW OFFICES OF ALAN H. YAMAMOTO

By: _____/s/____

Alan H. Yamamoto VSB #25872 643 S. Washington St. Alexandria, VA 22314

Tel: 703-684-4700 Fax 703 684-6643

Yamamoto.law@verizon.net

and

ESPINOSA | TRUEBA, PL

Jorge Espinosa (admitted pro hac vice)

FL Bar No. 779032

Jespinosa@etlaw.com

Francesca Russo (admitted pro hac vice)

FL Bar No. 174912

Frusso@etlaw.com

3001 S.W. 3rd Avenue

Miami, FL 33129

Tel: 305-854-0900 Fax: 305-285-5555

Counsel for ShirtMagic, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2011, I will electronically file the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Randall K. Miller, Esquire Nicholas M. DePalma, Esquire Arnold & Porter LLP 1600 Tyson Boulevard, Suite 900 McLean, VA 22101-4865

Douglas A. Winthrop, Esquire Elizabeth Wang, Esquire Howard Rice Nemerovski Canady Falk & Rabkin, A Professional Corporation Three Embarcadero Center, Seventh Floor San Francisco, CA 94111-4024

I hereby further certify that I will mail this document by U.S. Mail to any non-filing users in this case.

/s/

Alan H. Yamamoto VSB #25872 Counsel for ShirtMagic LLC Law Offices of Alan H. Yamamoto 643 S. Washington Street Alexandria, VA 22314 (703) 684-4700 (703) 684-6643 Fax Yamamoto.law@verizon.net